BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-000 [UG]

RECEIVED

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL D. BRADLEY
(OCA/USPS-T14-1)
August 14, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate

Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories

1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

Respectfully submitted,

GAIL WILLETTE

Director

Office of the Consumer Advocate

KENNETH E. RICHARDSON

Attorney

OCA/USPS-T14-1. Please refer to page 1 of USPS-14B where you state "This system variability is applied to non-MODS offices and certain general support operation in MODS offices." Is it your testimony that the variabilities you calculated for MODS offices are appropriate for application to non-MODS offices? If so, please provide all justification for your assumptions concerning these two types of facilities.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

KENNETH E. RICHARDSON

Attorney

Washington, D.C. 20268-0001 August 8, 1997